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Attorneys for Plaintiff

Prime Corporate Services, LLC

## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

PRIME CORPORATE SERVICES, LLC, a Utah limited liability company,

Plaintiff,

VS.

BUSINESS CREDIT CONSULTING, INC., a Nevada corporation; FRED SEYMOUR, an individual; CATHERINE FERRUGIA, an individual; and DANIEL WILLIAMS, an individual,

Defendants.

Case No. 2:25-cv-00198-GMN-DJA

STIPULATION AND [PROPOSED] ORDER FOR ACCEPTANCE OF SERVICE

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Plaintiff Prime Corporate Services, LLC ("Prime" or "Plaintiff") on the one hand, and Defendants Business Credit Consulting, Inc. ("Business Credit"), Fred Seymour ("Mr. Seymour"), Catherine Ferrugia ("Ms. Ferrugia"), and Daniel Williams ("Mr. Williams") (Business Credit, Mr. Seymour, Ms. Ferrugia, and Mr. Williams all together the "Defendants"), on the other hand, hereby agree and stipulate to accept service of Complaint and the Court's Summonses (ECF Nos. 1, 3), and in support of their stipulation, state the following:

- 24 1, 3), and in support of their stipulation, state the following
  - 1. Plaintiff filed Verified Complaint for Injunctive Relief and Damages (ECF No. 1) on January 30, 2025. (ECF No. 1.)
  - 2. The Court issued Summonses directed to Defendants Business Credit Consulting, Inc., Fred Seymour, Catherine Ferrugia, and Daniel Williams Pursuant on January 30, 2025. (ECF

No. 3.) 1

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- 3. To promote the just, speedy, and inexpensive resolution of this civil action, the Defendants hereby agree to accept service of the Court's Summonses (ECF No. 3) and the Complaint (ECF No. 1), effective as of February 7, 2025.
- 4. The parties hereby further agree and stipulate that the Defendants, and each of them, shall have until March 7, 2025, to file and serve their respective answers or other responses to the Complaint.

## IT IS SO AGREED AND STIPULATED:

HOWARD & HOWARD ATTORNEYS PLLC HOGAN HULET, PLLC

By: /s/ Jonathan W. Fountain W. West Allen, Esq. Nevada Bar No. 5566 Jonathan W. Fountain, Esq. Nevada Bar No. 10351 John (Trey) Pictum, Esq. Nevada Bar No. 15979 3800 Howard Hughes Parkway, Suite 1000 Las Vegas, Nevada 89169

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Attorneys for Defendants Business Credit Consulting, Inc. Fred Seymour,

Catherine Ferrugia, and

Daniel Williams

Prime Corporate Services, LLC

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: 2/14/2025

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